REMARKS

This response is submitted in response to the Office Action mailed May 2, 2005 to request reconsideration of the rejection of Claims 1-19 as set forth therein.

The Office Action and references cited therein have been carefully reviewed. The following remarks herein are considered to be responsive thereto. Claims 1 and 3-19 remain in this application; Claims 5, 16-18 have been amended herewith. Reconsideration of this application is respectfully requested.

In the Official Action dated May 2, 2005, the Examiner rejected claims 1, 11-14 and 19 under 35 U.S.C. §102 (e) as being anticipated by U.S. Patent No. 6,243,707 issued to Humpleman, et al. (Humpleman).

Further, the Examiner rejected claims 4-7, 9 and 10 under 35 U.S.C. §103 (a) as being unpatentable over Humpleman in view of U.S. Patent No. 6,505,348 issued to Knowles, et al. (Knowles). Claims 3 and 15-18 were rejected under 35 U.S.C. §103 (a) as being unpatentable over Humpleman in view of U.S. Patent Application No. 20020073081 A1 issued to Kido. Claim 8 was rejected under 35 U.S.C. §103 (a) as being unpatentable over Humpleman.

At the onset, the Applicants would like to note that Claims 16-18 have been amended to recite, in part, that the portion of the content-related information so configured thereby being suitable for processing by at least the electronic program guide of the first type and at least a second electronic program guide of a second type different than the first type. A similar limitation appears in independent Claims 1 and 19. No new matter has been added by the aforementioned amendment.

The patent to Humpleman discloses a system and method for controlling the command of a plurality of home devices that are connected to a home network. Accordingly, sequences of

commands that are used to control a respective home device are stored as a macro by the system in order to control the home device. A user is provided with the capability of operating a single button to implement a sequence of control commands from a HTML page contained within the respective home devices that are being controlled.

Acting as a client, the browser based DTV 102 "receives and interprets the HTML files associated with the home devices (acting as servers) and graphically displays the respective control and command information on its viewable display." (Col. 6, lines 56-60)

Humpleman further teaches that information contained in an EPG depends upon the particular DBSS that is used. "Therefore, in one embodiment of the invention, a process extracts the information from a particular EPG and converts it into a standard program format. The standard program format is then used to build an HTML program guide. The HTML program guide can be displayed on any browser based home device." (Col. 23, lines 2-7) (emphasis added).

Respectfully, Humpleman does not teach configuring at least a portion of the content-related information for consistency with corresponding portions of a reference information model thereby making the content-related information suitable for processing by an electronic program guide of a first type and at least a second electronic program guide of a second type different than the first type.

Humpleman teaches that information from the EPGs is converted to a standard program format. The standard program format is then "used to build **an HTML program guide.**" (Col. 23, lines 3-5). (emphasis added). Further, the single "HTML program guide can be displayed on any browser based home device." (Col. 23, lines 5-7).

Accordingly, in Humpleman a "master program guide" is created which will be able to be displayed on all of the devices within the network. The homogeneity of the HTML program guides provides for the additional inventive functionality of allowing all of the program guides processed on networked devices to be "displayed on any browser based home device." (Id.)

In contrast, in the claimed invention, a reference information model (RIM) is created as a definition set or, for semantics purposes, to allow interoperability of a plurality of devices within a network, where there isn't any prior agreement upon semantic definitions.

The RIM is designed such that content-related information can be generated therefrom in a consistent manner so as to be suitable for processing by a wide variety of different Electronic Program Guide (EPG) applications.

Specifically, the RIM is a structured specification of information requirements regarding exchange of content-related information and provides a consistent view of the information being transmitted in accordance with specified semantic and syntactic consensus.

A plurality of "program guides" is created from this one RIM. The content-related information is configured based upon the RIM.

The exacted configuration is dependent upon the EPG and the device. For example, a PC, a TV and a PVR would have three different schema for the content-related information. Each schema would use a different portion of the RIM.

Accordingly, one master program guide is not created from the RIM, but in fact, a plurality of different program schemas, wherein a different schema is created for a different device and EPG. It is this "different schemas" which allows the content-related information to be suitable for processing by at least the electronic program guide of the first type and at least a second electronic program guide of a second type different than the first type.

Therefore, Humpleman does not teach configuring at least a portion of the content-related information for consistency with corresponding portions of a reference information model thereby making the content-related information suitable for processing by an electronic program guide of a first type and at least a second electronic program guide of a second type different than the first type, but, in fact, teaches away from the same.

Therefore, it is respectfully submitted in view of the remarks presented that independent Claims 1 and 16-19 are allowable for at least the given reasons. Further, Claims 3-15, which depend from Claim 1, are at least allowable therewith since they depend from an allowable base claim. Consequently, the Examiner is respectfully requested to withdraw the rejection of Claims 1, 11-14 and 19 under 35 U.S.C. §102(e).

With regard to the rejections of Claims 17, 18 and 19 under 35 U.S.C. § 103(a), independent Claims 17, 18 and 19 are not rendered obvious by the cited references because neither the Humpleman patent, the Kido patent, nor the Knowles patent, whether taken alone or in combination, teach or suggest an apparatus for processing content-related information wherein the content-related information comprises one or more documents in an extensible mark-up language or that a portion of the content-related information is configured to be suitable for processing by an electronic program guide of the first type and at least a second electronic program guide of a second type different than the first type, as recited in independent Claims 17, 18 and 19, respectively. Accordingly, Claims 17, 18 and 19 patentably distinguish over the prior art and are allowable. Further, since Humpleman teaches away from the Examiner cited "multiple interactive program guides" of Knowles, there is no motivation to combine the art of the two. Consequently, the Examiner is respectfully requested to withdraw the rejections of Claims 17, 18 and 19 under 35 U.S.C. § 103(a).

Additionally, Applicant respectfully submits that the hypothetically combined references fail to teach "wherein the transforming step utilizes an extensible mark-up language style sheet generated at least in part utilizing the content-related information in the first format and the reference information model", as specifically recited in dependent Claim 15.

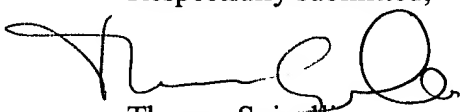
At best, Humpleman teaches converting the EPG information in standard program format and using the standard format to create a master "HTML program guide". However, the reference does not teach transforming the content-related information from a first non-compliant format by using the RIM and the content-relation information in the first format to a second format compliant with the reference information model.

Moreover, the Applicants submit that the hypothetical combination of the cited references fail to teach "wherein the configuring step further comprises generating one or more schema associated with the electronic program guide of the first type, the schema being generated based at least in part on an associated portion of the reference information model, and utilizing the schema to generate one or more documents comprising the content-related information" and "the configuring step further comprises generating a plurality of different schema, each of the schema being associated with one or more of the electronic program guides of the first type and an electronic program guide of a second type different than the first type, each of the schema being utilized to generate one or more documents comprising the content-related information", as specifically recited in Claims 9 and 10. Consequently, the Examiner is respectfully requested to withdraw the rejections of Claims 2-10, 15-18 under 35 U.S.C. § 103(a).

Lastly, Applicants would like to note that Claim 5 has been amended to overcome the Examiner's objections.

In view of the above, it is respectfully submitted that this application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued. If the Examiner believes that a telephone conference with Applicants' attorneys would be advantageous to the disposition of this case, the Examiner is requested to telephone the undersigned.

Respectfully submitted,



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